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10 **UNITED STATES DISTRICT COURT**
11
12 **DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA,
14 Plaintiff,
15 v.
16 RENE RAMIREZ,
17 Defendant.

18 Case No. 2:15-cr-00289-JCM-CWH

19 **STIPULATION TO CONTINUE
20 REVOCATION HEARING**
21 (First Request)

22 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
23 United States Attorney, and Supriya Prasad, Assistant United States Attorney, counsel for the
24 United States of America, and Yi Lin Zheng, counsel for Rene Ramirez, that the revocation
25 hearing currently scheduled for November 13, 2023 be vacated and set to a date and time
26 convenient to this Court, but no sooner than sixty (60) days.

27 The Stipulation is entered into for the following reasons:

28 1. The parties are nearing a conclusion to Mr. Ramirez's new federal case, 21-cr-
29 215-JAD-NJK.

30 2. The new federal case is set for trial on January 9, 2024. The parties anticipate
31 requesting a change of plea date before the commencement of trial.

32 3. Any resolution in Mr. Ramirez's new federal case will impact the resolution of
33 these revocation proceedings.

1 4. The parties agree to the continuance.

2 5. Mr. Ramirez is in custody and does not object to a continuance.

3 6. The additional time requested herein is not sought for purposes of delay, but
4 merely to allow counsel for defendant sufficient time within which to be able to effectively and
5 complete investigation of the discovery materials provided. Additionally, denial of this request
6 for continuance could result in a miscarriage of justice.

7 This is the first stipulation to continue filed herein.

8 DATED: November 7, 2023.

9 By /s/ Yi Lin Zheng

10 YI LIN ZHENG
11 Counsel for Rene Ramirez

12 JASON M. FRIERSON
13 United States Attorney

14 By /s/ Supriya Prasad

15 SUPRIYA PRASAD
16 Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
RENE RAMIREZ,
Defendant.

Case No. 2:15-cr-00289-JCM-CWH

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The parties are nearing a conclusion to Mr. Ramirez's new federal case, 21-cr-215-JAD-NJK.

2. The new federal case is set for trial on January 9, 2024. The parties anticipate requesting a change of plea date before the commencement of trial.

3. Any resolution in Mr. Ramirez's new federal case will impact the resolution of these revocation proceedings.

4. The parties agree to the continuance.

5. Mr. Ramirez is in custody and does not object to a continuance.

6. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided. Additionally, denial of this request for continuance could result in a miscarriage of justice.

CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

ORDER

IT IS FURTHER ORDERED that the revocation hearing is continued to **January 15, 2024 at 10:30 a.m.**

DATED November 8, 2023.

James C. Mahan
UNITED STATES DISTRICT JUDGE